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CLERK, U.S. DISTRICT COURT
5/22/18
CENTRAL DISTRICT OF CALIFORNIA
BY: CS DEPUTY

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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 SECURITIES AND EXCHANGE
18 COMMISSION,

19 Plaintiff,

20 vs.

21 TITANIUM BLOCKCHAIN
22 INFRASTRUCTURE SERVICES,
23 INC.; EHI INTERNETWORK AND
24 SYSTEMS MANAGEMENT, INC.
aka EHI-INSM, INC.; and MICHAEL
25 ALAN STOLLERY aka MICHAEL
STOLLAIRE,

26 Defendants.

Case No. CV18-4315-DSF(JPRx)
27 **DECLARATION OF JERRY C.**
28 **JONES**

1 **DECLARATION OF JERRY C. JONES**

2 I, Jerry C. Jones, declare, pursuant to 28 U.S.C. § 1746, as follows:

3 1. I am employed by Acxiom Corporation (“Acxiom”) as its Chief Ethics
4 and Legal Officer and Executive Vice President. I have personal knowledge of the
5 matters set forth below and, if called as a witness, would testify to these facts under
6 oath.

7 2. I make this declaration at the request of the United States Securities and
8 Exchange Commission (“SEC”).

9 3. Acxiom provides the data foundation for the world’s best marketers.

10 4. On or about February 16, 2018, the SEC requested that Acxiom provide
11 it with certain information concerning companies called Titanium Blockchain
12 Infrastructure Services, Inc. (“TBIS”) and EHI Internetwork and Systems
13 Management, Inc. (“EHI”), and an individual named Michael Stollaire aka Michael
14 Stollery or Michael Stoller (“Stollaire”).

15 5. In my capacity as the Chief Ethics and Legal Officer and Executive Vice
16 President of Acxiom, I am required, periodically and as needed, to become familiar
17 with the entities with which Acxiom has contracts, agreements, and/or other
18 substantive business relationships including alliances and partnerships. In addition,
19 in my capacity as the Chief Ethics and Legal Officer and Executive Vice President of
20 Acxiom, I share responsibility with other members of the Acxiom’s legal department,
21 intellectual property counsel, and others to protect Acxiom’s trade name, trademarks,
22 and service marks from infringement and other unauthorized uses by third parties. In
23 response to the SEC’s request, and at my direction, Acxiom personnel reviewed the
24 books, records, files, and computer systems of the business units within Acxiom that
25 might reasonably be expected to have or to have had any type of business relationship
26 with TBIS or EHI or Stollaire including as a customer, client, vendor, employee,
27 contractor, consultant, or other type of business transaction.

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1 6. Acxiom keeps and maintains business records in the course of its
2 transactions and regularly conducted activities as a regular practice. It is Acxiom's
3 practice to prepare such records at or near the time of the occurrence of the matters
4 set forth by, or from information transmitted by, a person with knowledge of those
5 matters. Acxiom maintains books and records of entities and persons with which it
6 has contracts, agreements, and/or other substantive business relationships, such the
7 purchase and sale of a product or service, making an investment, or entering into an
8 alliance or partnership, including authorized uses by third parties of its trade name,
9 trademarks, and service marks. Acxiom also maintains books and records of entities
10 and persons with which it has engaged as an employee, vendor, contractor, or
11 consultant. For the purposes of this declaration, as the Chief Ethics and Legal Officer
12 and Executive Vice President of Acxiom, I am the custodian of those records or am
13 otherwise qualified to testify about them.

14 7. Acxiom's books and records are current as of the date of this declaration.
15 The search of these materials has not disclosed any current or past business
16 relationship of any kind between Acxiom and TBIS or EHI or Stollaire directly.

17 8. The search of these materials indicates that Acxiom granted Michael
18 Stollery access to the company's internal information technology ("IT") network
19 prior to March 2009, but his access was terminated in March 2009. These materials
20 indicate that Stollery had been granted access because he was, at the time, a
21 contractor working on internal IT at Acxiom, but his involvement ceased in March
22 2009. These materials indicate the scope of the IT services involved the use of
23 commercially available IT products and services, and did not include blockchain
24 technology or digital currency.

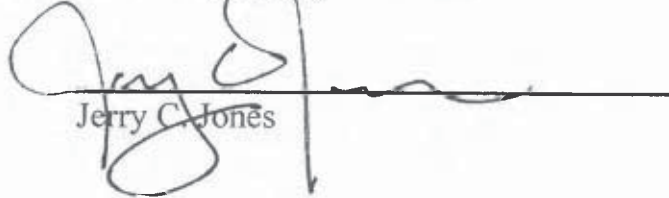
25 9. The SEC provided Acxiom with a purported testimonial attributed to
26 "Robert Brant, Senior Enterprise Engineer, Acxiom" that appeared on the TBIS
27 website. The search of Acxiom's books and records has disclosed that Mr. Brant's
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1 employment at Acxiom ended in 2015. These materials indicate that publication of
2 this purported testimonial on the TBIS website was not authorized by Acxiom.

3 10. The search of these materials has not disclosed that Acxiom has
4 authorized TBIS, EHI, or Stollaire to use Acxiom's name or logo in their marketing
5 or advertising or for any other purpose. The "Acxiom" name and logo are the
6 intellectual property of the company. Acxiom considers a third-party's unauthorized
7 use of the "Acxiom" name or logo in marketing or advertising as an infringement of
8 its intellectual property.

9 I declare under penalty of perjury under the laws of the United States of
10 America that the foregoing is true and correct.

11 Executed this 16th day of March, 2018 at Little Rock, Arkansas.

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14 Jerry C. Jones
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